

**KEAHON, FLEISCHER & FERRANTE**  
ATTORNEYS AT LAW  
1393 VETERANS MEMORIAL HIGHWAY - SUITE 312 NORTH  
HAUPPAUGE, NY 11788  
WWW.KEAHONLAW.COM

William J. Keahon  
Craig J. Fleischer  
Joseph J. Ferrante

TELEPHONE: (631) 361-5360  
TELECOPIER: (631) 361-5365  
Keahonpc@hotmail.com

August 17, 2015

The Honorable Joseph F. Bianco  
United States District Judge  
Eastern District of New York  
Central Islip, New York

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ **AUG 21 2015** ★

LONG ISLAND OFFICE

Re: United States v. Sergio Cerna  
Cr. No. 15-087 (S-1) (JFB)

Dear Judge Bianco:

I was assigned by the Court to represent Sergio Cerna in the above referenced matter. The government has given notice that Mr. Cerna faces a capital sentence. Accordingly, I respectfully request the appointment of learned counsel to assist in the preparation of a mitigation memoranda to be submitted to the Justice Department and other legal services as necessary to defend against the imposition of Capital punishment.

Mr. Joshua L. Dratel, Esq., an attorney vetted and found qualified to serve as learned counsel in potential death penalty cases in this district has agreed to join the defense team in this matter.

I respectfully ask that the Court assign Mr. Dratel as learned counsel. I have provided for the Court's convenience, a CJA 30 form executed by Mr. Dratel.

Thank you for your consideration.

Respectfully submitted,

  
Joseph J. Ferrante

*Request granted.*

cc: Joshua L. Dratel (By Email)

**SO ORDERED**

  
Joseph F. Bianco  
USDJ

Date Aug-21-2015  
Central Islip, N.Y.